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9 corporation, and GOFUNPLACES, INC., a British Virgin
10 Islands corporation

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

26 EADGEAR, INC., a California corporation,
27 and GOFUNPLACES, INC., a British Virgin
28 Islands corporation

29 Plaintiffs,

30 v.

31 RANDAL WILLIAMS, an individual,
32 PROSPERITY FORMULA, LLC, a limited
33 liability company, JUBIMAX LLC, a
34 limited liability company, JUBIMAX, INC.,
35 a British Virgin Islands corporation,
36 AFFILIATE PRO, INC., a British Virgin
37 Islands corporation, and DOES 1 to 100,
38 inclusive,

39 Defendants.

40 Case No. C 13-01186 JSW

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**STIPULATION TO CONTINUE CASE
MANAGEMENT CONFERENCE &
[PROPOSED] ORDER**

45 Date: November 8, 2013
46 Time: 1:30 p.m.
47 Courtroom: 11
48 Judge: Hon. Jeffrey S. White

1 All parties in the above-entitled action, by and through their respective counsel, enter into
2 the stipulation and propose to continue the Case Management Conference as following:

3 1. There is a related pending action involving similar parties in the United States
4 District Court for the Western District of Texas, captioned *Randal Ray Williams v. eAdGear*
5 *Holdings USA, Inc., et al.*, United States District Court for the Western District of Texas, San
6 Antonio Division Case No. 5:13-cv-00125-OLG-JWP;

7 2. Presently, Plaintiffs have filed motions for dismissal of the Texas action based on
8 lack of personal jurisdiction or for transfer of that related action to this Court. Parties have
9 completed their briefings and are waiting for the court to make rulings. It is expected that the
10 Texas court will issue its rulings in 30-60 days. A ruling transferring the Texas action to this
11 Court would substantially impact the scheduling of this action;

12 3. If the Texas motion based on lack of personal jurisdiction and to transfer the
13 related action is denied, Defendants intend to file their own motion to transfer this litigation to the
14 Texas court.

15 4. Parties' former counsel have had discussions about the structure for a global
16 settlement and resolution of this action, including the related action referenced above, and a third
17 action being prosecuted against Plaintiffs by another individual not involved in either this action
18 or the related action. Parties' present counsel will continue exploring settlement; and

19 5. Parties respectfully request the Court to continue the Case Manager Conference
20 from November 8, 2013 by 90 days, or to such a later date as may be convenient for the Court.

21 IT IS SO STIPULATED.

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23 DATED: November 1, 2013

LAW OFFICES OF DANNING JIANG

24 By: _____ /s/ Danning Jiang
25 _____
Danning Jiang, Esq.

26 Attorneys for Plaintiffs
27 EADGEAR, INC., a California
28 corporation, and GOFUNPLACES,
INC., a British Virgin Islands
corporation

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4 DATED: November 1, 2013

VENARDI ZURADA, LLP

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By: /s/ Martin Jacek Zurada
Martin Jacek Zurada, Esq.

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Attorneys for Defendants
RANDAL WILLIAMS, an
individual, PROSPERITY
FORMULA, LLC, a limited liability
company, JUBIMAX LLC, a limited
liability company, JUBIMAX, INC.,
a British Virgin Islands corporation,
AFFILIATE PRO, INC., a British
Virgin Islands corporation

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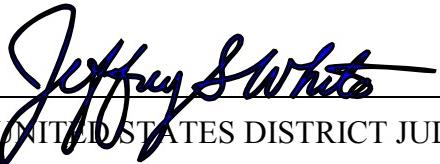
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1 **CASE MANAGEMENT ORDER**
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4 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the November 8, 2013
5 Case management Conference is continued to February 14, 2014,
6 at 1:30 p.m. in Courtroom No. 11. [In addition, the Court makes the further orders stated below:]
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12 IT IS SO ORDERED.
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14 Dated: November 5, 2013

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17 UNITED STATES DISTRICT JUDGE
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